

**IN THE UNITED STATES BANKRUPTCY COURT FOR
THE DISTRICT OF MARYLAND
(GREENBELT DIVISION)**

In re:)	
)	
DARLEEN CASH,)	Case No. 17-19412
)	Chapter 13
Debtors.)	
_____)	

**DEBTOR’S OBJECTION TO PROOF OF CLAIM AS
FILED BY THORNTON MELLON LLC**

COMES NOW debtor, Darleen Cash, by and through counsel, and pursuant to 11 U.S.C. §§ 502 (b) and 506 object to the Proof of Claim filed by Thornton Mellon, LLC (“Thornton”), and in support hereof states as follows:

1. On or about July 11, 2017, Debtor filed a voluntary petition pursuant to Chapter 13 of the United States Bankruptcy Code.
2. On or about April 20, 2018, the Thornton filed a proof of claim in the total amount of \$6,488.06.
3. Thornton, subsequently amended this claim on May 2, 2018, pursuant to court instruction to utilize the correct form.
4. Debtor objects to Thornton’s claim on the basis of being untimely, as the deadline to file proof of claims in this case was set for November 22, 2017 for non-governmental claims, and January 8, 2018 for governmental agencies.
5. Further, debtor objects on the basis of Thornton’s claim being unenforceable against her. Thornton's claim purports to include a dollar amount that is allegedly a high bid premium that it paid to Prince George’s County, in which they will receive back from the county.

6. Accordingly, Thornton's claim, as filed, should be disallowed in full or in part, on the basis of untimely and unenforceable against the debtor..

WHEREFORE, Debtor respectfully prays that this Honorable Court enter an order:

- A. Sustaining Debtor's Objection to the proof of claim filed by Thornton Mellon, LLC;
- B. Disallowing the proof of claim as filed by Thornton Mellon, LLC, and
- C. Granting such other and further relief as the Court deems necessary.

NOTICE OF OBJECTION TO PROOF OF CLAIM

Within thirty (30) days after the date on the certificate of service of this objection, the claimant may file and serve a memorandum in opposition, together with any documents and other evidence the claimant wishes to attach in support of its claim, unless the claimant wishes to rely solely upon the proof of claim; and an interested party may request a hearing that will be held at the court's discretion.

Date: June 7, 2018

Respectfully submitted,

Gilman & Edwards, LLC

By: /s/ Kasey L. Edwards

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